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Attorneys for Defendants
Madonna Louise Ciccone and Bhakti Touring, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

BRANDO ENTERPRISES, L.P., a
Delaware limited partnership,

Plaintiff,

vs.

MADONNA LOUISE CICCONE
(p/k/a/ "Madonna"), an individual;
BHAKTI TOURING, INC., a Nevada
Corporation; and DOES 1-10, inclusive,

Defendants.

CASE NO. CV12-8994-GAF(VBKx)

**STIPULATION TO ADDITIONAL
EXTENSION OF TIME FOR
DEFENDANTS MADONNA LOUISE
CICCONE AND BHAKTI TOURING,
INC. TO RESPOND TO INITIAL
COMPLAINT**

Complaint served: November 5, 2012
Current response date: January 21, 2013
New response date: February 18, 2013

Hon. Gary A. Feess

Plaintiff Brando Enterprises, L.P. (“Plaintiff”), and defendants Madonna Louise Ciccone and Bhakti Touring, Inc. (collectively, “Defendants”), by and through their respective counsel, enter into the following stipulation:

WHEREAS, Plaintiff served Defendants with the summons and complaint on November 5, 2012, so that the response to the complaint was due by December 7, 2012;

WHEREAS, pursuant to Local Rule 8-3, the parties filed a stipulation extending the time to respond to the initial complaint by 30 days to January 7, 2013 (Dkt. 7) because they were engaged in settlement discussions, and then filed an additional stipulation extending the time to respond to the initial complaint to January 21, 2012 because settlement discussions were still ongoing (Dkt. 8);

WHEREAS, the parties have reached a settlement in principle but need additional time to execute the settlement agreement;

THEREFORE, the parties stipulate to an order further extending the time for Defendants to respond to the initial complaint from January 21, 2013 to February 18, 2013.

Counsel for Plaintiff has authorized this filing and concurs in the content of this filing.

DATED: January 18, 2013

Charles J. Harder
HARDER MIRELL & ABRAMS LLP

By: _____ /s/
Charles J. Harder
Attorneys for Plaintiff
Brando Enterprises, L.P.

DATED: January 18, 2013

Jennifer L. Jones
PROSKAUER ROSE LLP

By: /s/
 Jennifer L. Jones
 Attorneys for Defendants
 Madonna Louise Ciccone and
 Bhakti Touring, Inc.